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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOC#: _____

DATE FILED: 4/10/2020

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April 8, 2020

ADMITTED IN
NY, NJ, PA, IL, DC

VIA ECF AND EMAIL

Hon. Andrew L. Carter, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: Lopez et al. v. MNAF Pizzeria Inc., et al.
Case Number 18-cv-6033 (ALC)(OTW)

Dear Judge Carter:

We represent plaintiffs Ivan Lopez and Kevin Campos in the above-referenced matter, and write regarding plaintiffs' summary judgment motion in this case. According to the briefing schedule ordered by Your Honor on March 13, plaintiffs' moving papers are due this Friday, April 10.

We submit this letter, pursuant to Paragraph 1.D. of Your Honor's Individual Rules, to respectfully request that the Court extend that deadline (and the remainder of the briefing schedule) by 30 days. That would make the new schedule as follows:

Plaintiffs' moving papers: May 11, 2020
Defendants' opposition: June 1, 2020
Plaintiffs' reply papers: June 22, 2020.

We make this request because the current situation has, in addition to keeping us away from our offices, prevented us, despite our efforts, from being able to confer with our clients (one of whom requires the assistance of an interpreter) to prepare supporting affidavits and obtain their signatures on the same. We are optimistic that 30 days will give us enough time to complete that process.

We contacted counsel for defendants and asked for consent to this request. However, they have not given us an answer one way or the other; first, counsel told us only that defendants did not think the motion had merit, and then when we followed up he said that he had to confer with his clients and get back to us. We followed up again, but we still have not heard back from him, and since Your Honor requires that such requests for adjournments be made two business days in advance, we submit this request without knowing defendants' position.

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This is the first request by either party for an extension of this schedule, and it will not affect any other deadlines in this case. We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

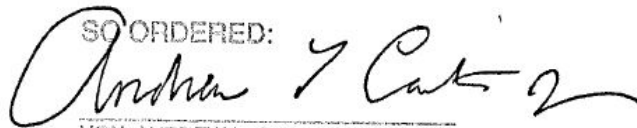
Respectfully submitted,



David Stein

cc: Christopher S. Martone, Esq. (via ECF)

MEMO ENDORSED

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

April 10, 2020